IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

GLOBAL WEATHER PRODUCTIONS, LLC

\$ \$ \$ \$ \$ \$

Plaintiff,

v.

Case No: 5:23-cv-01350-JKP-ESC

JOE PAGS MEDIA, LLC

\$ \$ \$ \$ \$

Defendant.

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

PLEASE TAKE NOTICE that, upon this Notice of Motion for Default Judgment; the declaration of Craig Sanders and exhibits attached thereto, and the pleadings and prior proceedings herein; Plaintiff Global Weather Productions, LLC ("Plaintiff") will move the Court, before the Honorable Jason K. Pulliam (U.S.D.J.) at the United States District Court, Western District of Texas (San Antonio Division), at a time and date to be determined by the Court for an Order GRANTING Plaintiff's application for default judgment against Defendant Joe Pags Media, LLC ("Defendant") in the amount of \$30,000.00 in statutory damages under 17 U.S.C. § 504(c); \$1400.00 in attorneys' fees and \$440.00 in costs under 17 U.S.C. § 505; and for such further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that Defendant's opposition papers, if any, must be served within fourteen (14) days after service of these motion papers; and such service made upon Defendant by U.S. mail via its last known business addresses shall be deemed sufficient service thereof.

Dated: May 10, 2024

SANDERS LAW GROUP

By: <u>/s Craig B. Sanders</u>
Craig B. Sanders, Esq.
333 Earle Ovington Blvd., Ste. 402
Uniondale, New York 11553
Email: csanders@barshaysanders.com

Tel: (516) 203-7600 Fax: (516) 282-7878

Attorneys for Plaintiff

TO:

JOE PAGS MEDIA, LLC c/o Joseph J Pagliarulo 287 Coyote Trail Spring Branch, TX 78070

CERTIFICATE OF CONFERENCE

As Defendant JOE PAGS MEDIA, LLC has yet to appear and defend this action, no conference with the opposing party was held prior to filing this default application.

s/ Craig B. Sanders / Craig B. Sanders